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6 Attorneys for Robert Barkman  
7

8 **UNITED STATES DISTRICT COURT**  
9  
**DISTRICT OF NEVADA**

10  
11 UNITED STATES OF AMERICA,

Case No. 3:19-cr-00052-RCJ-WGC

12 Plaintiff,

**REQUEST FOR TELEPHONIC  
HEARING**

13 v.

14 ROBERT BARKMAN,

15 Defendant.  
16

17  
18 Comes now the Defendant, ROBERT BARKMAN, by and through his counsel of  
19 record, Christopher P. Frey, Assistant Federal Public Defender, and hereby requests to schedule  
20 a telephonic hearing on April 16, 2020,<sup>1</sup> or at any time convenient to the Court but no earlier  
21 than approximately one week before April 16, 2020, to address (1) whether the 30-day  
22 suspension of Mr. Barkman's condition of probation that he present himself to the Washoe

23  
24 \_\_\_\_\_  
25 <sup>1</sup> The date of April 16, 2020, is 30 days from date of entry of the Court's Order Granting  
Emergency Motion to Temporarily Modify Intermittent Confinement as a Condition of  
Probation Due to the COVID-19 Pandemic. ECF No. 21 at 10: 21-21 ("IT IS FURTHER  
ORDERED that given the given the COVID-19 pandemic, Mr. Barkman's condition of  
probation that he present himself to the Washoe County Detention Facility for intermittent  
confinement is SUSPENDED for 30 days from entry of this Order.").

1 County Detention Facility for intermittent confinement should be extended in light of the  
2 COVID-19 pandemic, and (2) the duration of any extension.<sup>2</sup>

3 DATED this 17th day of March, 2020.

4 RENE L. VALLADARES

5 Federal Public Defender

6 /s/ *Christopher Frey*

7 By: \_\_\_\_\_

8 CHRISTOPHER P. FREY

9 Assistant Federal Public Defenders

10 Attorneys for Robert Barkman

26 <sup>2</sup> This motion is timely filed; no deadline applicable.

## **CERTIFICATE OF ELECTRONIC SERVICE**

The undersigned hereby certifies that she is an employee of the Federal Public Defender for the District of Nevada and is a person of such age and discretion as to be competent to serve papers.

That on March 17, 2020, she served an electronic copy of the above and foregoing, REQUEST FOR TELEPHONIC HEARING, by electronic service (ECF) to the person named below:

NICHOLAS A. TRUTANICH  
United States Attorney  
PETER WALKINGSHAW  
Assistant United States Attorney  
400 South Virginia Street, Ste 900  
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NICHOLAS A. TRUTANICH  
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Gary N Donner  
U.S. Department of Justice  
601 D. Street, N.W.  
Rm. 2144  
Washington, DC 20004

/s/ Katrina Burden  
Employee of the Federal Public Defender